

## LEVIN-EPSTEIN & ASSOCIATES, P.C.

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January 10, 2024

**VIA ECF**

The Hon. Joseph A. Marutollo, U.S.M.J.  
U.S. District Court, Eastern District of New  
York 225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Oyenuga v. Presidential Security Services LLC et al*  
**Case No.: 1:22-cv-04972-DG-RER**

Dear Honorable Magistrate Judge Marutollo:

This law firm represents Plaintiffs Oludare Oyenuga and Janiya Preston (together, the “Plaintiffs”) in the above referenced matter.

Pursuant to Your Honor’s Individual Motion Rules, this letter respectfully serves to request an adjournment of the in-person initial pretrial conference currently scheduled for January 17, 2024 to a date and time after Defendants Presidential Security Services LLC, International Trendz, LLC and Ismail Qadar (collectively, the “Defendants”), have appeared in the action.

This is the first request of its kind. The basis for this request is that Defendants have not appeared in this action. In the event of Defendants’ continued non-appearance, Plaintiffs intend on seeking a default judgment. Alternatively, Plaintiff intends on proceeding with the initial case conference, once Defendants have appeared.

In light of the foregoing, it is respectfully requested that the Court adjourn the in-person initial pretrial conference currently scheduled for January 17, 2024 to a date and time after Defendants have appeared.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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